

## 1. PURPOSE AND OBJECTIVES

We recognize government's duty to protect human rights and our responsibility to respect<sup>1</sup> the human rights of our workforce and communities wherever we do business. In addition, we will identify opportunities to support and promote human rights. Implementation of this Global Standard will enable us to uphold international human rights standards, make informed decisions to manage risks to people and to our business, and implement our Sustainability and Stakeholder Engagement Policy.

This Standard is designed to complement and enhance our commitments put forth in the Indigenous Peoples Standard, Land Acquisition and Involuntary Resettlement Standard, Stakeholder Relationship Management Standard, Cultural Resource Management and the Social Baseline and Impact Assessment Standard by defining the minimum requirements to identify, prevent, mitigate, track and report on how we address risks to human rights associated with our operations. This Standard also defines the minimum requirements for supporting and promoting human rights and enabling remediation through legitimate processes where we identify that we have caused or contributed to adverse impacts.

## 2. REQUIREMENTS

### 2.1 Planning and Design

#### 2.1.1 Assessment

- 2.1.1.1 Sites shall respect the human rights of their workforce and take a risk based approach to the management of human rights acting in accordance with host country regulation, internationally recognized human rights frameworks (including the due diligence process in the UN Guiding Principles on Business and Human Rights) and existing Newmont Standards.
- 2.1.1.2 For: (i) existing operations or (ii) changes to existing operations unlikely to impact human rights, Sites shall integrate human rights considerations into their existing internal and external processes (including updates of Social Impact Assessments (SIAs), risk assessments and grievance mechanisms).
- 2.1.1.3 For: (i) new projects or (ii) changes to existing operations with the potential to impact human rights, Sites shall integrate a Human Rights Impact Assessment (HRIA) approach into their SIAs.
- 2.1.1.4 Sites may undertake a stand-alone HRIA if they determine it necessary in their operating context.
- 2.1.1.5 Sites shall maintain ongoing processes to identify changes in human rights risks including through: (i) engagement with external stakeholders, (ii) capturing human rights risks in the Site Risk Management System and updating them during quarterly reviews, and (iii) complaints/grievance mechanisms.
- 2.1.1.6 Assessments shall identify and assess actual and potential human rights impacts from: (i) Site's own activities and; (ii) Site's business relationships (including relationships with vendors, security forces and governments). Special attention shall be paid to identify and address the needs of vulnerable and/or marginalized community members who may be disproportionately affected by Sites activities.

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<sup>1</sup> According to the UN Guiding Principles on Business and Human Rights, the corporate responsibility to respect human rights, means that business enterprises should act with due diligence to avoid infringing on the rights of others and address adverse impacts with which they are involved

- 2.1.1.7 Sites shall use individuals or teams with relevant skills, local knowledge and human rights expertise for their assessments. Where HRIAs will be carried out, they should be conducted by organizations/ individuals with demonstrable credibility.
- 2.1.1.8 Our workforce and external stakeholders, inclusive of affected communities, shall be provided with opportunities to express their views on potential human rights risks, impacts, and mitigation measures. Stakeholder concerns shall be documented and addressed during the assessment process and within the assessment reports in an open and transparent manner. Participation shall be designed so that the process is inclusive, accessible, free of manipulation and undertaken in a timely and culturally appropriate manner.

## **2.2 Implementation and Management**

### **2.2.1 Human Rights Management Plans**

- 2.2.1.1 Sites or regions (as appropriate) shall develop Human Rights Management Plans or incorporate the following areas into existing plans of relevance: (i) the measures Sites will take to address any human rights risks or impacts identified in the assessments, (ii) metrics and/or other measures to track Site's management of human rights risks or impacts, (iii) the function/department responsible and accountable for managing each human rights risk or impact, (iv) the human rights contact point for the region, (v) a tailored human rights training plan (including on the Voluntary Principles on Security and Human Rights), (vi) how complaint/grievance mechanisms will be used to identify trends in human rights complaints that may require changes to Site management systems, processes or activities, (vii) the resources required (time, human and financial) to implement the plan.
- 2.2.1.2 Sites or regions (as appropriate) shall form a cross-functional human rights working group which will provide oversight for the implementation of the Human Rights Management Plan.
- 2.2.1.3 The most senior Site based S&ER Manager will be accountable for implementing the Human Rights Management Plan. In addition, Sites shall have their Human Rights Management Plans signed off by the most senior Site based Manager and will share their Human Rights Management Plans with the most senior Regional manager and corporate S&ER team.
- 2.2.1.4 Sites shall undertake activities to support and promote human rights while recognizing these activities do not offset a failure to respect human rights throughout their operations.

### **2.2.2 Human Rights Due Diligence on Business Relationships**

- 2.2.2.1 Sites or regions (as appropriate) shall involve representatives from S&ER, Supply Chain and Legal in the development of appropriate human rights clauses in standard contract templates. These templates shall be used for new vendors and when contracts of existing vendors are up for renewal.
- 2.2.2.2 Human rights contract provisions shall include Newmont's commitment to human rights consistent with the Universal Declaration of Human Rights. Human rights provisions shall also include the requirement that Newmont be notified if a vendor becomes aware of any human rights issues related to its activities with Newmont.
- 2.2.2.3 In the event that Newmont becomes aware of a human rights issue in our supply chain, Newmont shall request that the relevant vendor conduct an investigation and develop an action plan for implementation to address the issue. Newmont shall notify the vendor that it may be subject to a variety of legal implications associated with such issue, including potential termination of the agreement in question.

### 2.2.3 Voluntary Principles on Security and Human Rights

2.2.3.1 In relation to interactions with public and private security forces and in accordance with Newmont's Security and Human Rights Global Standard (SEC-PS-005), Sites shall: (i) identify security issues and impacts, (ii) investigate and report allegations, (iii) provide training and awareness and; (iv) monitor and evaluate compliance with the Voluntary Principles on Security and Human Rights.

### 2.2.4 Site Based Grievance Mechanisms

2.2.4.1 In accordance with Newmont's Stakeholder Relationship Management Standard (NEM-SER-STA-016), Sites shall develop community complaint and/or grievance mechanisms consistent with the UN Guiding Principles on Business and Human Rights which should allow for the identification, tracking and resolution of complaints and grievances that relate to, or could escalate into, human rights issues. The existence of Site based mechanisms should not inhibit complainant's access to legal or judicial recourse processes.

2.2.4.2 Sites shall inform the corporate S&ER team of the following complaints/grievances/incidents and the means they are taking to address them: (i) where a complaint/grievance/incident is flagged as a human rights issue by the complainant or; (ii) where Sites determine that a complaint/grievance/incident has the potential or may be perceived to have a severe negative impact on human rights.

## 2.3 **Performance Monitoring**

### 2.3.1 Tracking and Updating

2.3.1.1 Sites shall monitor and evaluate the issues being raised through their complaint/grievance mechanisms quarterly to identify trends in human rights that may require changes to management systems, processes or activities.

2.3.1.2 Human Rights Assessment processes will be updated and validated no less than every five years or when risks to human rights significantly change, whichever is more frequent.

2.3.1.3 Human Rights Management Plans shall be updated on an on-going basis as risks and impacts change. Updated plans shall include: (i) an evaluation of responses to actual and potential human rights impacts (ii) the results of the evaluations of Site's human rights performance and; (iii) modifications to systems/processes/procedures to improve effectiveness. Sites shall include perspectives on the company's human rights performance including from affected stakeholders in these updates.

### 2.3.2 Communicating

2.3.2.1 Sites shall regularly communicate how it is managing human rights issues to: (i) affected stakeholders, (ii) employees, (iii) relevant external stakeholders, (iv) the corporate S&ER team

2.3.2.2 Sites shall provide information required for Newmont to fulfill its external reporting obligations under the Global Reporting Initiative, Dow Jones Sustainability Index and other relevant reporting frameworks, as requested by the corporate office.